

Darren G. Reid (#11163)  
Engels Tejada (#11427)  
Benjamin D. Passey (#19234)  
HOLLAND & HART LLP  
222 S. Main Street, Suite 2200  
Salt Lake City, UT 84101  
Telephone: (801) 799-5800  
dgreid@hollandhart.com  
ejtejeda@hollandhart.com  
bdpassey@hollandhart.com

Erik F. Stidham (*Admitted Pro Hac Vice*)  
Jennifer M. Jensen (*Admitted Pro Hac Vice*)  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714  
Telephone: (208) 342-5000  
efstidham@hollandhart.com  
jmjensen@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,  
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

---

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

---

In re:

AMMON EDWARD BUNDY  
Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

---

**DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTIONS TO COMPEL  
DEBTOR'S COMPLIANCE WITH RULE 2004 SUBPOENAS FOR EXAMINATION  
AND PRODUCTION OF DOCUMENTS**

---

I, Erik F. Stidham, declare and state as follows:

1. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. I am admitted to this Court *pro hac vice* for this case. Along with my colleagues identified above, I am counsel for St. Luke's Health System, Ltd.,

St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, the "St. Luke's Creditors").

2. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

3. I make this Declaration in support of St. Luke's Creditors' Motion to Compel Debtor's Compliance with Rule 2004 Subpoena for Examination and Production of Documents filed concurrently herewith.

4. Attached hereto as **Exhibit A** is a true and correct copy of correspondence dated February 10, 2025, to Debtor attaching the Order Regarding Motions to Compel dated February 7, 2025.

5. Attached hereto as **Exhibit B** is a true and correct copy of correspondence dated February 23, 2025, to Debtor detailing his failure to produce requested documents, reminding him of the February 25, 2025 Rule 2004 examination, and addressing Debtor's plan to share Zoom link for examination with his followers.

6. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of the transcript of the Rule 2004 Examination of Ammon Bundy dated February 25, 2025.

7. Debtor recorded and livestreamed his examination on his YouTube channel, @RealAmmonBundy. The videos of the examination are still available on his public YouTube account: <https://www.youtube.com/watch?v=UDUj-XTd5LA&t=4509s>; <https://www.youtube.com/watch?v=EHM-HSMG9Z4&t=11s>. The videos show a third-party was with Debtor during the examination.

8. Attached hereto as **Exhibit D** is a true and correct copy of a summary of total Rule 2004 examination time.

9. Attached hereto as **Exhibit E** is a true and correct copy of a list of documents identified during the Rule 2004 examination.

10. Attached hereto as **Exhibit F** is a true and correct copy of the list of all the questions Debtor refused to answer or answer in full during the Rule 2004 Examination.

11. Attached hereto as **Exhibit G** is a true and correct copy of a list of documents identified as not received from Debtor as requested in the Amended Subpoena.

12. As of the date of this Motion, Debtor has not produced all documents responsive to the subpoena.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 3rd day of June, 2025.

/s/ Erik F. Stidham

Erik F. Stidham

### CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

Matthew James Burne      matthew.burne@usdoj.gov; james.gee@usdoj.gov;  
lindsey.huston@usdoj.gov; rinehart.peshell@usdoj.gov;  
rachell.e.d.hughes@usdoj.gov; brittany.deweitt@usdoj.gov

George B. Hoffman      ghofmann@ck.law; mparks@ck.law

Mark C. Rose      trustee@mbt-law.com; UT32@ecfcbis.com

U.S. Trustee      USTPRegion19.SK.ECF@usdoj.gov

**By U.S. First Class Mail with postage pre-paid:**

Ammon Edward Bundy  
P.O. Box 1062  
Cedar City, UT 84720

Ammon Edward Bundy  
896 E 400 S  
New Harmony, UT 84757

**By Internet email:**

Ammon Edward Bundy  
[aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com)  
[aebundy@msn.com](mailto:aebundy@msn.com)

HOLLAND & HART LLP

/s/ Erik F. Stidham  
Erik F. Stidham (*Admitted Pro Hac Vice*)  
Jennifer M. Jensen (*Admitted Pro Hac Vice*)